

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

-----x

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

Civil Action No.

vs.

3:21-cv-03302-MBS-TJH-RMG

THOMAS C. ALEXANDER, et al.,

Defendants.

-----x

Remote deposition

July 6, 2022

10:02 a.m.

VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION of
EMMA DEAN, before Michele Moskowitz, a shorthand
reporter and Notary Public of the State of New
York.

1 DEAN

2 was a lot of information.

3 Q. Do you recall reviewing any materials
4 on the legal definition of intentional
5 discrimination?

6 A. Again, I don't -- I don't want to
7 waive any attorney-client privilege here. The
8 more we're getting into the research that I do,
9 you know, that -- that's difficult to me. I
10 don't recall anything like that, but, again, I
11 just remind you that I'm an attorney working for
12 my clients.

13 Q. Understood.

14 A. I don't recall.

15 Q. I'm just asking if -- about the
16 materials that you reviewed in preparation for
17 the map room. I was not trying to get into any
18 kinds of conversations you had.

19 A. Sure.

20 Q. Okay. Do you know what intentional
21 discrimination means in the context of
22 redistricting?

23 A. I would -- you know, again, this
24 is -- we're at July 6, 2022. As I probably
25 mentioned in the last deposition, I -- I don't